

Vandagraph Ltd

Artificial Intelligence (AI) - LLM Usage Policy

1. Purpose

The purpose of this policy is to provide guidance on the responsible use of Artificial Intelligence (AI) technologies within Vandagraph Ltd .

The Company recognises that AI systems can improve efficiency, support decision-making, assist with document preparation, analyse data, and provide valuable business insights. AI is therefore encouraged as a business tool when used appropriately and responsibly.

This policy aims to ensure that AI is used safely, ethically, legally, and in compliance with the Company's Quality Management System and applicable legislation.

2. Scope

This policy applies to:

- All employees.
- Directors.
- Contractors.
- Temporary staff.
- Consultants.
- Any third party using Company information or systems on behalf of the Company.

The policy covers all forms of AI systems, including:

- Large Language Models (LLMs).
 - Chatbots.
 - AI-assisted search tools.
 - Image generation systems.
 - AI data analysis tools.
 - AI coding assistants.
 - Future AI technologies adopted by the Company.
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3. Company Position on AI

The Company views AI as a valuable assistant, not a replacement for human judgement.

AI systems generate responses based on statistical probability and patterns identified within training data. AI does not "know" facts in the same way as a human expert and may occasionally generate incorrect, incomplete, misleading, or fabricated information.

For this reason:

AI should be treated as a knowledgeable assistant, not an authority.

All important outputs must be reviewed and verified by a suitably competent person before use.

4. Acceptable Uses

AI may be used to assist with:

- Drafting documents.
- Producing summaries.
- Data analysis.
- Creating reports.
- Preparing training materials.
- Generating ideas and suggestions.
- Software development and code review.
- Research and information gathering.
- Internal process improvement activities.
- Customer service support materials.
- Marketing content generation.

Users remain responsible for verifying all outputs before use.

5. Prohibited Uses

AI must not be used to:

- Make autonomous medical decisions.
- Make autonomous regulatory decisions.
- Approve product releases.
- Approve quality records.
- Approve complaints investigations.
- Approve CAPA actions.
- Approve supplier evaluations.
- Sign documents on behalf of individuals.
- Replace required competence, training, or professional judgement.
- Circumvent established Company procedures.

Final responsibility always remains with authorised Company personnel.

6. Data Protection and GDPR

Users must exercise caution when entering information into external AI systems.

The following information must not be entered into public AI systems unless specifically authorised:

- Patient-identifiable information.
- Personal health information.
- Confidential customer information.
- Sensitive supplier information.
- Commercially confidential information.
- Passwords, credentials, or security information.
- Any information restricted by contract or legislation.

Where AI systems are used to process Company information, users must ensure compliance with:

- UK GDPR.
 - Data Protection Act 2018.
 - Customer confidentiality obligations.
 - Supplier confidentiality obligations.
 - Internal information security requirements.
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7. Quality and Regulatory Activities

Where AI is used within quality, regulatory, or compliance activities:

- AI outputs must be reviewed by competent personnel.
- AI-generated content must be treated as draft information.
- Evidence and conclusions must be independently verified.
- Regulatory submissions must not rely solely on AI-generated information.
- Risk assessments must remain under human control.

The Company remains fully responsible for all regulatory and quality decisions regardless of any AI assistance used.

8. Accuracy and Verification

Before using AI-generated information:

Users should consider:

- Is the information reasonable?
- Is supporting evidence available?
- Does it agree with known facts?
- Has it been independently checked?
- Is the source trustworthy?

Particular care should be taken where information may affect:

- Patient safety.
- Product performance.

- Regulatory compliance.
 - Quality management.
 - Commercial decisions.
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9. Intellectual Property and Copyright

Users should ensure that AI-generated content:

- Does not knowingly infringe copyright.
- Does not reproduce protected material without permission.
- Is reviewed before publication.
- Complies with customer and supplier agreements.

Where uncertainty exists, management approval should be sought before publication or distribution.

10. Security

Only approved AI systems should be used for Company business purposes.

Users must:

- Protect login credentials.
 - Follow Company cybersecurity requirements.
 - Report suspected misuse immediately.
 - Avoid sharing sensitive information with unauthorised AI platforms.
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11. Training and Awareness

The Company will provide appropriate guidance regarding AI use.

Employees should understand:

- The benefits of AI.
 - The limitations of AI.
 - Data protection requirements.
 - Verification requirements.
 - Risks associated with inaccurate outputs.
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12. Responsibilities

All Users

Responsible for:

- Following this policy.

- Protecting Company information.
- Verifying AI outputs.
- Reporting concerns.

Management

Responsible for:

- Monitoring appropriate use.
 - Reviewing risks associated with AI technologies.
 - Ensuring compliance with legal and regulatory requirements.
 - Supporting staff in the safe use of AI.
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13. Policy Review

This policy shall be reviewed annually or sooner if:

- Significant changes occur in AI technology.
 - Regulatory requirements change.
 - Company processes change.
 - New risks are identified.
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Policy Statement

Vandagraph Ltd recognise that Artificial Intelligence can provide significant business benefits when used responsibly. The Company encourages the use of AI as an assistive tool to improve efficiency, knowledge sharing, innovation, and process improvement. However, AI systems are probabilistic tools and not authoritative sources of truth. Human judgement, competence, verification, and accountability shall always remain the responsibility of Company personnel.